



Qwest
10th Floor
1801 California Street
Denver, CO 80202
Phone 303.383.6652
Fax 303.383.8456

Michael B. Adams, Jr.
Senior Attorney

REDACTED – FOR PUBLIC INSPECTION

January 27, 2006

VIA HAND DELIVERY

RECEIVED

JAN 27 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, S.W.
Washington, DC 20554

Federal Communications Commission
Office of Secretary

Re: *In the Matter of Petition of Qwest Corporation for Limited Modification of LATA Boundaries to Provide Extended Area Service Between Its Exchanges in the Minneapolis/St. Paul Metropolitan Calling Area and the Kilkenny, Minnesota Exchange* - WC Docket No. 05-321

Dear Ms. Dortch:

On November 14, 2005, Qwest Corporation ("Qwest") filed a petition in the above-captioned matter. The filing of Qwest's petition was necessitated by the fact that Frontier Communications of Minnesota, Inc. ("Frontier") was granted Extended Area Service ("EAS") status for the Minneapolis Metropolitan Calling Area ("MCA") by the Minnesota Public Utilities Commission. The result of such grant required Qwest to request a LATA boundary waiver from the Federal Communications Commission ("Commission"). The petition was publicly noticed on November 17, 2005.¹

In its petition, Qwest stated on page 3, paragraph (6) that: "Qwest does not have access to information as to the number of lines in exchanges owned by other local service providers in the MCA, nor to the number of access lines provided by Frontier in the Kilkenny exchange." As such, in its petition at Attachment B, Qwest did not provide the number of access lines that Frontier provides in the Kilkenny Exchange.

¹ See Public Notice, Pleading Cycle Established for Comments on Qwest's Request for Limited Modification of the LATA Boundary to Provide Extended Area Service Between Certain Exchanges in the State of Minnesota, DA 05-2984, rel. Nov. 17, 2005. Comments were due December 19, 2005. No parties filed comments in response to the Public Notice.

No. of Copies rec'd
List ABCDE

054

Ms. Marlene H. Dortch
January 27, 2006

Page 2 of 2

The Commission's staff members have requested that Qwest supplement its petition by providing the Commission with the number of Frontier access lines in the Kilkenny Exchange that will be affected by the LATA waiver. In response to this request, Frontier has provided its number of access lines in the Kilkenny Exchange to Qwest with the proviso that Frontier considers the information confidential and requested that Qwest maintain its confidentiality.

With this submission, Qwest is therefore requesting confidential treatment of Frontier's access line data, and is submitting both a confidential and non-confidential version of this filing.

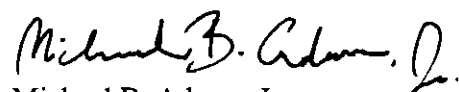
Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457 and 0.459, Qwest requests confidential treatment of the data contained in the "Confidential – Not For Public Inspection" version of the enclosed Supplemental Attachment B. The confidential version of Supplemental Attachment B with this submission has been designated as **"CONFIDENTIAL – NOT FOR PUBLIC INSPECTION."** Frontier considers its data contained in the Supplemental Attachment B as competitively sensitive information which is not generally available to the public. Release of the data would have a substantial negative competitive impact on Frontier. Qwest provides a justification for such confidential treatment in the attached Appendix.

This "Redacted – For Public Inspection" version of this submission includes the Supplemental Attachment B with the confidential information redacted as well as the Appendix containing the confidentiality justification. This redacted version of Supplemental Attachment B with this submission has been designated as **"REDACTED – FOR PUBLIC INSPECTION."**

This **"REDACTED –FOR PUBLIC INSPECTION"** submission is being filed via hand delivery. An original and four copies are being submitted as well as one copy to be stamped as received and returned to the messenger who has been instructed to wait for it. Simultaneously, the confidential, not for public inspection version of this submission is being filed under separate cover.

Please contact the undersigned with any questions.

Sincerely,


Michael B. Adams, Jr.

Enclosures (Supplemental Attachment B (Redacted), Appendix)

cc: Jodie Donovan-May (via e-mail at Jodie.May@fcc.gov)
Best Copy and Printing, Inc. (via e-mail at FCC@bcpiweb.com)

SUPPLEMENT TO ATTACHMENT B

COMPANY	Frontier
CLLI CODE	KLKNMXKRS5
WIRE CENTER	KILKENNEY
Access Line Quantities	REDACTED

Appendix

Confidentiality Justification

Qwest requests confidential treatment of the competitively sensitive information being provided in the enclosed Supplemental Attachment B, because it is confidential and proprietary competitively sensitive information. That information should be afforded confidential treatment under either (or both) 47 C.F.R. § 0.457 and § 0.459.

47 C.F.R. § 0.457

The information designated as confidential is confidential and proprietary to Frontier as “trade secrets and commercial or financial information” under Section 0.457(d) which is not routinely available for public inspection. Disclosure of such information to the public would risk revealing company-sensitive proprietary information and would have a substantial negative competitive impact on Frontier.

47 C.F.R. § 0.459

The financial information designated as confidential is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

Information for which confidential treatment is sought:

Qwest requests that the Supplemental Attachment B attached to the confidential version of this submission and designated as “**CONFIDENTIAL – NOT FOR PUBLIC INSPECTION**” be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. Supplemental Attachment B contains confidential and proprietary competitively sensitive information.

Commission proceeding in which the information was submitted:

The proceeding in which this competitively sensitive information is submitted is WC Docket No. 05-321.

Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged:

As noted above, the information designated as confidential is competitively sensitive data. In this regard, public disclosure of this information would be harmful to Frontier.

Degree to which the information concerns a service that is subject to competition; and manner in which disclosure of the information could result in substantial competitive harm:

This competitively sensitive information relates to services that are subject to competition, is not made publicly available by Frontier and would generally not be subject to routine public inspection under the Commission's rules (47 C.F.R. § 0.457(d)), demonstrating that the Commission already anticipates that release of this kind of information likely could produce competitive harm.

Measures taken by Frontier to prevent unauthorized disclosure; and availability of the information to the public and extent of any previous disclosure of the information to third parties:

Frontier treats this competitively sensitive information as confidential and has protected it from disclosure to parties outside its company.

Justification of the period during which Frontier asserts that the material should not be available for public disclosure:

Frontier cannot determine at this time any date on which this information should not be considered confidential or would become stale for purposes of the current inquiry, except that the information would be handled in conformity with general Frontier records retention policies, absent any continuing legal hold on the data.

Other information that Frontier believes may be useful in assessing whether its request for confidentiality should be granted:

Under applicable Commission and court rulings, the information in question should be withheld from public disclosure. Exemption 4 of the Freedom of Information Act shields information that is (1) commercial or financial in nature; (2) obtained from a person outside government; and (3) privileged or confidential. The competitively sensitive information designated as confidential satisfies this test.